

1 Magistrate Judge Mary Alice Theiler
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AT SEATTLE
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WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 UNITED STATES OF AMERICA, }
11 Plaintiff, }
12 v. }
13 TIMOTHY GEORGE DORAN, }
14 Defendant. }

CASE NO. MJ11-496

COMPLAINT FOR VIOLATION
Title 18, U.S.C., Section 2250

16 BEFORE The Honorable Mary Alice Theiler, United States Magistrate Judge, U.S. Courthouse,
17 Seattle, Washington.

18 The undersigned complainant being duly sworn states:

19 **COUNT 1**
(Failure to Register and Update Sex Offender Registration)

20 Beginning on a date unknown, but sometime after October 8, 2009, and continuing until
21 the present, in King County, within the Western District of Washington, and elsewhere, the
22 defendant, TIMOTHY GEORGE DORAN, a sex offender who is required to register and update
23 sex offender registration pursuant to the Sex Offender Registration and Notification Act, and
24 who traveled in interstate or foreign commerce, did knowingly fail to register and update his
25 sexual offender registration.

26 All in violation of Title 18, United States Code, Section 2250.

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1 The undersigned complainant being duly sworn further states:

2 1. I, Lisa Stephenson, am a Senior Criminal Investigator and Deputy United States
 3 Marshal assigned to the Seattle, Washington office. I have been employed by the United States
 4 Marshals Service for over nineteen years. I graduated from the United States Marshals Service
 5 Academy and the Federal Law Enforcement Training Center for Criminal Investigators. I am a
 6 Senior Inspector for the Sex Offender Investigations Branch for the United States Marshals
 7 Service, Western District of Washington, Seattle Division. One of my responsibilities is to
 8 investigate crimes involving individuals who are convicted sex offenders and who have failed to
 9 register or update their information as required by the Sex Offender Registration and
 10 Notification Act (“SORNA”) (codified at Title 42, United States Code, Section 16901, *et seq.*).

11 2. This affidavit is made in support of a criminal complaint charging TIMOTHY
 12 GEORGE DORAN with failure to register and update his sex offender registration, in violation
 13 of Title 18, United States Code, Section 2250. The information set forth below has come from
 14 either personal investigation or has been related to me personally by other law enforcement
 15 officers associated with this investigation.

16 **I. DEFENDANT’S SEX OFFENDER STATUS**

17 3. On or about June 29, 1992, TIMOTHY GEORGE DORAN was convicted in
 18 Pierce County of Rape in the Second Degree, in violation of RCW 9A.44.050, and was
 19 sentenced to serve 89 months of imprisonment. Because Rape in the Second Degree is a Class A
 20 felony, TIMOTHY GEORGE DORAN is required to register as a sex offender for life.

21 4. Federal law requires that any “sex offender” must “register, and keep the
 22 registration current, in each jurisdiction where the offender resides, where the offender is an
 23 employee, and where the offender is a student.” 42 U.S.C. § 16913(a). Keeping the registration
 24 current is defined as “not later than 3 business days after each change of name, residence,
 25 employment or student status, appear in person in at least 1 jurisdiction involved pursuant to
 26 subsection (a) of this section and inform that jurisdiction of all changes in the information
 27 required for that offender in the sex offender registry.” 42 U.S.C. § 16913(c). “Sex offender” is
 28 defined as including anyone who has committed “(i) a criminal offense that has an element

1 involving a sexual act or sexual contact with another" or "(ii) a criminal offense that is a
 2 specified offense against a minor." 42 U.S.C. § 16911(5). Based on the foregoing, TIMOTHY
 3 GEORGE DORAN is a sex offender who is required to register and update his registration
 4 information.

5 **II. DEFENDANT'S FAILURE TO REGISTER**

6 5. As part of his sentencing on June 29, 1992, TIMOTHY GEORGE DORAN signed
 7 a Judgment and Sentence, confirming that he must register as a sex offender within 30 days of
 8 his release in the county of his residence.

9 6. On or about April 26, 1999, TIMOTHY GEORGE DORAN was released from the
 10 Washington Department of Corrections. TIMOTHY GEORGE DORAN signed King County
 11 Sheriff's Office Sex Offender Registration Notification form, confirming his understanding of
 12 the Sex Offender Registration process which requires, among other things, that:

13 a. if you move to a new address within the same county, you must send
 14 written notice of the change of address to the county sheriff at least 14 days before moving.

15 b. if you move to a new county, you must send written notice of the change of
 16 address at least 14 days before moving to the county sheriff in the new county of residence and
 17 must register with that county sheriff within 24 hours of moving. You must also send written
 18 notice within 10 days of the change of address in the new county to the county sheriff with
 19 whom you last registered.

20 c. If you move out of Washington State, you must also send written notice
 21 within 10 days of moving to the new state or foreign country to the county sheriff with whom
 22 you last registered.

23 7. Records of the King County Sheriff's Department Sex Offender Unit further
 24 revealed TIMOTHY GEORGE DORAN submitted the King County Sheriff's Office Sex
 25 Offender Registration Notification forms on May 14, 2001, March 15, 2004 and January 12,
 26 2007. TIMOTHY GEORGE DORAN signed each form, acknowledging his understanding of
 27 sex offender registration requirements.

1 8. On October 8, 2009, TIMOTHY GEORGE DORAN signed a Registered
 2 Sex/Kidnapping Offender Registration form notifying the King County Sheriff's Department that
 3 he had moved from an address in Renton, Washington to an address in Seattle, Washington (the
 4 "Seattle Address"). King County did not receive any subsequent notification that TIMOTHY
 5 GEORGE DORAN had moved.

6 9. On January 1, 2011, Seattle Police Officer Timothy Fields visited the Seattle
 7 Address in an attempt to verify if TIMOTHY GEORGE DORAN was residing at the residence.
 8 Officer Fields contacted the property owner, H.V., who stated that TIMOTHY GEORGE
 9 DORAN had moved out of the residence approximately six months ago.

10 10. On October 3, 2011, H.V. was interviewed again by the undersigned. He stated
 11 that TIMOTHY GEORGE DORAN told H.V. that he (TIMOTHY GEORGE DORAN) was
 12 moving to Vietnam to live with a woman named T.L. H.V. stated that TIMOTHY GEORGE
 13 DORAN borrowed a truck from a friend to move out his belongings. H.V. stated that he does
 14 not remember when TIMOTHY GEORGE DORAN moved out, although H.V. remembered that
 15 it was a month or two after TIMOTHY GEORGE DORAN had an altercation with his sister,
 16 which prompted the police to respond to the Seattle Address. Based on my review of Seattle
 17 Police Department incident # 2010177092, the police were called to the Seattle Address on May
 18 28, 2010; the report listed H.V. as a witness.

19 11. H.V. stated that, about three months after TIMOTHY GEORGE DORAN moved
 20 out of the Seattle Address, TIMOTHY GEORGE DORAN called H.V. and told him to tell law
 21 enforcement that he still resided at the Seattle Address. When H.V. told him that he would not
 22 do that, TIMOTHY GEORGE DORAN stated that he was supposed to be residing at the Seattle
 23 Address after getting in trouble for hitting his wife. H.V. did not know that TIMOTHY
 24 GEORGE DORAN was a sex offender.

25 12. On August 24, 2011, a query of records from U.S. Customs & Border Protection
 26 disclosed the following travel records regarding TIMOTHY GEORGE DORAN:

27 a. On August 29, 2010, TIMOTHY DORAN traveled from Seattle,
 28 Washington to Taipei, Taiwan.

1 b. On September 11, 2010, TIMOTHY DORAN traveled from Taipei,
2 Taiwan to Seattle, Washington.

3 c. On October 30, 2010, TIMOTHY DORAN traveled from Seattle,
4 Washington to Inchon, South Korea.

5 d. On March 9, 2011, TIMOTHY DORAN traveled from Taipei, Taiwan to
6 Seattle, Washington.

7 13. Public databases confirm that TIMOTHY GEORGE DORAN has not registered as
8 a sex offender in other jurisdictions. On September 27, 2011, a query of the Department of
9 Justice, Dru Sjodin National Sex Offender Public Website disclosed TIMOTHY GEORGE
10 DORAN was currently registered at the Seattle Address. The website maintains records of sex
11 offenders located nationwide. On the same date, a query of the Washington Association of
12 Sheriffs and Police Chiefs Sex Offender Website listed TIMOTHY GEORGE DORAN as a
13 non-compliant offender, last known to be residing at the Seattle Address. The website maintains
14 records of sex offenders located in Washington State.

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1 || III. CONCLUSION

2 14. Based on the above facts, I respectfully submit that there is probable cause to
3 believe that TIMOTHY GEORGE DORAN committed a violation of Title 18, United States
4 Code, Section 2250, by failing to register and update his sex offender registration status as
5 required.


Lisa Stephenson, Complainant
Senior Inspector
United States Marshals Service

Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe the defendant committed the offenses set forth in the Complaint.

DATED this 13 day of October, 2011

Mary Alice Theiler
Mary Alice Theiler
United States Magistrate Judge